


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

 ZURICH AMERICAN INSURANCE CO. :
Plaintiff, : CIVIL ACTION No.: 07 Civ. 2943
v. :
MUNICH REINSURANCE AMERICA, :
INC. :
Defendant. :

MOTION FOR ADMISSION OF MARYANN C. HAYES PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Bruce M. Friedman, a member in good standing of the bar of this Court, hereby move this Court before the Honorable Leonard B. Sand, at the United States Court House, 500 Pearl Street, Courtroom 15a, New York, New York, on a date to be determined by the Court, for an Order allowing the admission pro hac vice of

Applicant's Name: MARYANN C. HAYES
Firm Name: Bates & Carey LLP
Address: 191 North Wacker Suite 2400
City/State/Zip: Chicago, IL 60606
Phone Number: (312) 762-3100
Fax Number: (312) 762-3200

MARYANN C. HAYES is a member in good standing of the Bar of the State of Illinois

There are no pending disciplinary proceedings against MARYANN C. HAYES in any State or Federal court.

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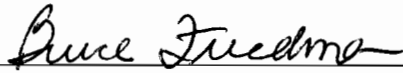
PLEASE TAKE FURTHER NOTICE that defendant waives oral argument on this motion unless plaintiff serves papers in opposition in which case oral argument is respectfully requested.

A proposed form of Order is attached hereto.

Dated: 6/12/07

City, State: New York, New York

RUBIN, FIORELLA, & FRIEDMAN LLP

By 
Bruce M. Friedman (BF 9074)

Attorneys for Defendant
292 Madison Ave, 11th Floor
New York, New York 10017
Phone: (212) 447-4620
Fax: (212) 953-2462

TO: Phoebe A. Wilkinson, Esq.
CHADBOURNE & PARKE LLP
Attorneys for Plaintiff
30 Rockefeller Plaza
New York, New York 10112

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZURICH AMERICAN INSURANCE CO.	:	
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Plaintiff,	:	CIVIL ACTION NO.: 07 Civ. 2943
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v.	:	
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MUNICH REINSURANCE AMERICA,	:	
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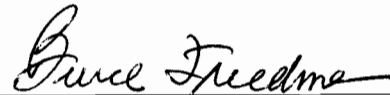
**AFFIDAVIT OF BRUCE M. FRIEDMAN IN SUPPORT OF MOTION TO ADMIT
MARYANN C. HAYES PRO HAC VICE**

Bruce Friedman, being duly sworn, hereby deposes and says as follows:

1. I am a partner with Rubin, Fiorella, & Friedman, counsel for Munich Reinsurance America, Inc. in the above captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set herein and in support of Munich Reinsurance America, Inc.'s motion to admit Maryann C. Hayes as counsel pro hac vice to represent Munich Reinsurance America, Inc. in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1975. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Maryann C. Hayes for approximately six months.
4. Ms. Hayes is a partner of the law firm, Bates & Carey, in Chicago, IL.
5. I have known Ms. Hayes to be a skilled attorney and a person of integrity. Ms. Hayes is a member in good standing of the bar of Illinois.
6. Ms. Hayes is fully familiar with the facts that are the subject of this action and defendant has requested that she represent the company herein. Ms. Hayes specializes in reinsurance, which is the subject of plaintiff's claims in this action. Her experience and knowledge of the facts at issue are critical to Munich Reinsurance America, Inc.'s representation in this action and Munich Reinsurance America, Inc. would be substantially prejudiced if she were not allowed to appear pro hac vice on its behalf.
7. Ms. Hayes has agreed to comply with all applicable rules governing practice before this Court and the courts of the State of New York, including all disciplinary rules, if she is admitted pro hac vice in this action. If Ms. Hayes is admitted pro hac vice, payment of the \$25 pro hac vice fee to the Clerk will be made immediately thereafter.

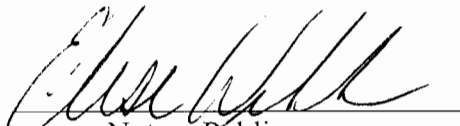
8. Counsel for plaintiff Zurich American Insurance Company has advised me that plaintiff has no objection to the admissions pro hac vice of Ms. Hayes.
9. Accordingly, I am pleased to move the admission of Maryann C. Hayes, pro hac vice.
10. I respectfully submit a proposed order granting the admission of Maryann C. Hayes, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Maryann C. Hayes, pro hac vice, to represent Munich Reinsurance America, Inc. in the above captioned matter, be granted.



Bruce M. Friedman (BF 9074)

Sworn to before this
12th day of June, 2007


Notary Public

ELISE WELCH
Notary Public, State of New York
No. 01WE4775573
Qualified in Nassau County
Commission Expires December 31, 20 10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZURICH AMERICAN INSURANCE CO. :
Plaintiff, : CIVIL ACTION No.: 07 Civ. 2943
v. :
MUNICH REINSURANCE AMERICA, :
INC. :
Defendant. :

MOTION FOR ADMISSION OF ROBERT J. BATES, JR. PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Bruce M. Friedman, a member in good standing of the bar of this Court, hereby move this Court before the Honorable Leonard B. Sand, at the United States Court House, 500 Pearl Street, Courtroom 15A, New York, New York, on a date to be determined by the Court, for an Order allowing the admission pro hac vice of

Applicant's Name: ROBERT J. BATES, JR.
Firm Name: Bates & Carey LLP
Address: 191 N. Wacker Suite 2400
City/State/Zip: Chicago, IL 60606
Phone Number: (312) 762-3132
Fax Number: (312) 762-3200

ROBERT J. BATES, JR. is a member in good standing of the Bar of the State of Illinois.

There are no pending disciplinary proceedings against ROBERT J. BATES, JR. in any State or Federal court.

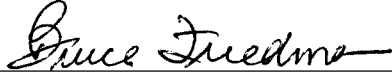
PLEASE TAKE FURTHER NOTICE that defendant waives oral argument on this motion unless plaintiff serves papers in opposition in which case oral argument is respectfully requested.

A proposed form of Order is attached hereto.

Dated: 6/12/07

City, State: New York, New York

RUBIN, FIORELLA, & FRIEDMAN LLP

By 
Bruce M. Friedman (BF 9074)
Attorneys for Defendant
292 Madison Ave, 11th Floor
New York, New York 10017
Phone: (212) 447-4620
Fax: (212) 953-2462

TO: Phoebe A. Wilkinson, Esq.
CHADBOURNE & PARKE LLP
Attorneys for Plaintiff
30 Rockefeller Plaza
New York, New York 10112

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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INC.	:	
	:	
Defendant.	:	

**AFFIDAVIT OF BRUCE M. FRIEDMAN IN SUPPORT OF MOTION TO ADMIT
ROBERT J. BATES, JR. PRO HAC VICE**

Bruce Friedman, being duly sworn, hereby deposes and says as follows:

1. I am a partner with Rubin, Fiorella, & Friedman, counsel for Munich Reinsurance America Inc. in the above captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set herein and in support of Munich Reinsurance America, Inc.'s motion to admit Robert J. Bates, Jr. as counsel pro hac vice to represent Munich Reinsurance America, Inc. in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1975. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Robert J. Bates, Jr. for eight years.
4. Mr. Bates is a partner of the law firm, Bates & Carey LLP, in Chicago, IL.
5. I have known Mr. Bates to be a skilled attorney and a person of integrity. Mr. Bates is a member in good standing of the bar of Illinois.
6. Mr. Bates is fully familiar with the facts that are the subject of this action and defendant has requested that he represent the company herein. Mr. Bates specializes in reinsurance, which is the subject of plaintiff's claims in this action. His experience and knowledge of the facts at issue are critical to Munich Reinsurance America, Inc.'s representation in this action and Munich Reinsurance America, Inc. would be substantially prejudiced if he were not allowed to appear pro hac vice on its behalf.
7. Mr. Bates has agreed to comply with all applicable rules governing practice before this Court and the courts of the State of New York, including all disciplinary rules, if he is admitted pro hac vice in this action. If Mr. Bates is admitted pro hac vice, payment of the \$25 pro hac vice fee to the Clerk will be made promptly thereafter.

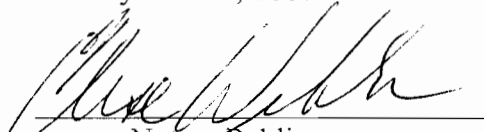
8. Counsel for plaintiff Zurich American Insurance Company has advised me that plaintiff has no objection to the admission pro hac vice of Mr. Bates.
9. Accordingly, I am pleased to move the admission of Robert J. Bates, Jr., pro hac vice.
10. I respectfully submit a proposed order granting the admission of Robert J. Bates, Jr., pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Robert J. Bates, Jr., pro hac vice, to represent Munich Reinsurance America, Inc. in the above captioned matter, be granted.



Bruce M. Friedman (BF 9074)

Sworn to before this
12th day of June, 2007


Notary Public

E L I S E W E L C H
Notary Public, State of New York
No. 01WE4775573
Qualified in Nassau County
Commission Expires December 31, 2010

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,	:	CIVIL ACTION No.: 07 Civ. 2943
	:	
v.	:	
	:	
MUNICH REINSURANCE AMERICA,	:	
INC.	:	
Defendant.	:	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN NOTICE

Upon the motion of Bruce M. Friedman, attorney for Munich Reinsurance America, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Maryann C. Hayes

Firm Name: Bates & Carey LLP

Address: 191 North Wacker Suite 2400

City/State/Zip: Chicago, IL 60606

Telephone/Fax: (312) 762-3100 / (312) 762-3200

Email Address: mhayes@batescarey.com

is admitted to practice pro hac vice as counsel for Munich Reinsurance America, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: 6/12/07
City, State: New York, New York

United States District/Magistrate Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZURICH AMERICAN INSURANCE CO.	:		
	Plaintiff,	:	CIVIL ACTION No.: 07 Civ. 2943
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	Defendant.	:	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN NOTICE

Upon the motion of Bruce M. Friedman, attorney for Munich Reinsurance America, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Robert J. Bates, Jr.

Firm Name: Bates & Carey LLP

Address: 191 N. Wacker Suite 2400

City/State/Zip: Chicago, IL 60606

Telephone/Fax: (312) 762-3132 / (312) 762-3200

Email Address: rbates@batescarey.com

is admitted to practice pro hac vice as counsel for Munich Reinsurance America, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: 6/12/07
City, State: New York, New York

United States District/Magistrate Judge

CERTIFICATES OF GOOD STANDING

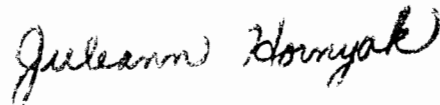
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Maryann C. Hayes

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 5, 1981 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Wednesday, May 30, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

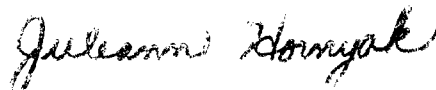
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Robert Joseph Bates, Jr.

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 3, 1978 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Wednesday, May 30, 2007.

A handwritten signature in cursive script, reading "Juleann Hornyak".

Clerk

CERTIFICATE OF SERVICE

BRUCE M. FRIEDMAN certifies as follows:

1. I am an attorney-at-law of the State of New York for this matter and a partner of the law firm of RUBIN, FIORELLA & FRIEDMAN LLP, attorneys for Defendant, MUNICH REINSURANCE AMERICA, INC. I am familiar with the facts set forth herein.

2. I hereby certify that on the 13th day of June 2007, I served copies of the within **Motion for Admission Pro Hac Vice**, upon the following address of designated counsel regular mail by causing said to be placed in a pre-paid envelope and deposited in a receptacle duly maintained by the United States Postal Service:

Phoebe A. Wilkinson, Esq.
CHADBOURNE & PARKE LLP
Attorneys for Plaintiff
30 Rockefeller Plaza
New York, New York 10112

3. Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Executed: New York, New York
June 13, 2007



BRUCE M. FRIEDMAN